

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MICHAEL ALONSO, <i>et al.</i> ,)	
)	
Plaintiffs,)	
)	
v.)	Case No. 12-cv-07373 (consolidated
)	with Case No. 15-cv-4693)
LESLIE J. WEISS, <i>et al.</i> ,)	
)	Judge Joan H. Lefkow
Defendants.)	
_____)	Magistrate Judge Sheila Finnegan
)	
RANDALL S. GOULDING,)	
)	
Plaintiff,)	
)	
v.)	
)	
LESLIE J. WEISS,)	
BARNES & THORNBURG, LLP, <i>et al.</i> ,)	
)	
Defendants.)	

JOINT STATUS REPORT

This Joint Status Report addresses several issues:

1. The Alonso Plaintiffs and Defendants are submitting this Joint Status Report to advise Magistrate Judge Sheila Finnegan that they may have resolved an issue that is under consideration. Defendants' Motion to Compel (Dkt. 91) requested, among other things, that the Alonso Plaintiffs be compelled to produce ESI in a Concordance format that is compatible with Defendants' counsel's document-review software. The Court took that request under advisement. Thereafter, the parties agreed to the following procedure: (a) Plaintiffs will produce ESI in native format; (b) Defendants then attempt to convert it at their own cost into the requested format; and (c) after this is accomplished, the Defendants will either state that this resolves the issue of the form in which the response is to be provided, or provide an explanation

to the Alonso Plaintiffs as to why it does not and the parties will thereafter cooperate in attempting to quickly resolve the remaining formatting issues.

2. Defendants and the Alonso Plaintiffs also agree that the Stipulation and Claw Back Letter that were prepared by Defendants are sufficient and will be executed.

3. At the request of the Court's clerk, the Alonso Plaintiffs and Defendants are also submitting this Joint Status Report to advise the Court of the issues in Defendants' Motion to Compel that remain to be addressed at the continued February 19, 2016 hearing. Defendants maintain that the issue of the Alonso Plaintiffs' efforts to locate and produce responsive documents and electronically stored information remains to be addressed; the Alonso Plaintiffs maintain that the Declaration of Eric W. Berry (Dkt. 106) resolves that issue.

4. Defendants and the Alonso Plaintiffs are also prepared to further address any remaining issues that the Court took under advisement on February 11, but apart from that referenced in paragraph 3 above, do not believe that further argument is necessary.

5. Finally, the Alonso Plaintiffs' counsel hereby requests to participate in the February 19, 2016 hearing by telephone. The Defendants do not object to this request.

Respectfully submitted,

THE ALONSO PLAINTIFFS

LESLIE WEISS and
BARNES & THORNBURG LLP

By: /s/ Eric W. Berry
One of Their Attorneys

By: /s/ Andrew P. Shelby
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CERTIFICATE OF SERVICE

The undersigned attorney, upon oath, hereby certifies that on February 18, 2016, he caused a true and correct copy of the foregoing ***Joint Status Report***, to be filed electronically with the Court's CM/ECF system, and that notice of this filing was sent by electronic mail to all parties by operation of the Court's electronic filing system or by email to anyone unable to receive electronic filings as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF system.

/s/ Andrew P. Shelby